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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

HELENE SAREN-LAWRENCE,

Defendant.

Adv. Pro. No. 10-04898 (SMB)

Appeal No. _____

**NOTICE OF MOTION FOR LEAVE TO APPEAL THE BANKRUPTCY COURT'S
APRIL 4, 2016 ORDER IMPLEMENTING ITS MARCH 23, 2016 BENCH RULING AND
FOR A STAY PENDING APPEAL**

PLEASE TAKE NOTICE that, upon a Memorandum of Law in Support and the
Declaration of Helen Davis Chaitman, Esq., together with exhibits annexed thereto, Defendant

Helene Saren-Lawrence and her non-defendant husband James Lawrence (collectively, “Movants”), by their undersigned counsel, hereby move the Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for an Order pursuant to 28 U.S.C. § 158(a) and the Federal Rules of Bankruptcy Procedure 8003 and 8004: (1) granting leave to appeal the *Order Implementing the Court’s March 23, 2016 Bench Ruling (i) Denying Defendants’ Motion to Dismiss Pursuant to Fed. R. Civ. P. 37(b), 41(b), and Cross-Motion to Quash and for Protective Order; (ii) Denying Defendants’ Motion for Temporary Restraining Order and Stay of Enforcement of Subpoenas; and (iii) Granting the Trustee’s Motion to Compel* entered on April 4, 2016 on the 08-01789 (SMB) docket [ECF No. 13028]; (2) for a stay pending appeal; and (3) granting such other further relief in the Movants’ favor as the Court deems just and proper.

In view of the exceptional circumstances and importance of the issue presented in this appeal, Movants respectfully request oral argument in connection with this motion. *See* Fed. R. Bankr. P. 8003(b).

Dated: New York, New York
April 15, 2016

CHAITMAN LLP

By: /s/ Helen Davis Chaitman
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